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Counsel for Plaintiff Rosa Lopez and Minor V-S-

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

Rosa Lopez, as Legal Guardian of V-S-,
a Minor and Successor in Interest to the
Estate of Victor Sanchez Brito,

Plaintiff,

v.

United States of America; GEO Group,
Inc., a corporation,

Defendants.

Case No. 4:23-cv-04292-DMR

**STIPULATION AND JOINT REQUEST
TO PERMIT SUPPLEMENTAL
BRIEFING REGARDING DEFENDANT
UNITED STATES OF AMERICA'S
MOTION TO DISMISS**

Pursuant to Local Rule 7-12, Plaintiff Rosa Lopez and Defendant United States of America hereby stipulate to the filing of supplemental briefs of no more than five pages in length so that they may address issues raised in the United States of America's Reply in Support of Motion to Dismiss, ECF No. 27. In support of this request, they state as follows:

1. On October 24, 2023, Defendant United States of America filed a Motion to Dismiss. ECF No. 15.
2. On November 7, 2023, Plaintiff filed her opposition. ECF No. 26.
3. On November 14, 2023, the United States of America filed its reply. ECF No. 27.
4. On December 8, 2023, the Court sua sponte continued the hearing on the motion to dismiss from December 14, 2023 to January 25, 2024. ECF No. 35.
5. On January 23, 2024, the Court sua sponte continued the hearing on the motion to dismiss from January 25, 2024 to March 28, 2024. ECF No. 36.
6. Plaintiff believes that supplemental briefing regarding certain matters raised in the reply brief will benefit the Court in resolving the pending motion.
7. Defendant United States of America has consented to supplemental briefing, provided it is given a reasonable opportunity to respond.

For the foregoing reasons, Plaintiff Rosa Lopez and Defendant United States of America hereby stipulate to the filing of supplemental briefing to address matters raised in the reply brief, ECF No. 27. They further stipulate that, should the Court approve, (1) Plaintiff will submit her sur-reply within three business days of the Court's Order approving this stipulation and that her brief will not exceed five pages in length, and (2) Defendant United States of America will submit a response to Plaintiff's sur-reply within seven business days of the filing of Plaintiff's sur-reply and that its brief will not exceed five pages in length.

Dated: January 26, 2024

Respectfully submitted,

Law Office of Bardis Vakili, P.C.

/s/ Bardis Vakili
Bardis Vakili

ISMAIL J. RAMSEY
United States Attorney

s/Shiwon Choe
SHIWON CHOE
Assistant United States Attorney
Attorneys for Defendant United States of America

* In compliance with Civil Local Rule 5-1(i)(3), the filer attests that all signatories have concurred in the filing of this document.